

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Criminal No. 19-cr-20498

Honorable Paul D. Borman

v.

Violations:

D-1 Alex Albert Castro,  
also known as “Sniper,”  
D-2 Jason Dale Kechego,  
also known as “J,” and

18 U.S.C. § 1111(a)  
18 U.S.C. § 1117  
18 U.S.C. § 113(a)

Defendants.

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**REDACTED**  
**FIRST SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES:

**GENERAL ALLEGATIONS**

At all times relevant to this First Superseding Indictment:

1. Milan Correctional Institution (“FCI Milan”) was a federal correctional institution with a detention center located in Milan, Michigan, and operated by the Federal Bureau of Prisons.
2. FCI Milan was a facility within the special maritime and territorial jurisdiction of the United States as defined in Title 18, United States Code, Section 7(3).

3. Defendants ALEX ALBERT CASTRO, also known as “Sniper” (“CASTRO”) and JASON DALE KECHEGO, also known as “J” (“KECHEGO”); and Adam Taylor Wright, also known as “Creeper” (“Wright”) were inmates housed in the East Unit of FCI Milan’s detention center.

4. Christian Maire (“Maire”) and Michal Figura (“Figura”) were inmates and cellmates housed in the East Unit of FCI Milan’s detention center.

5. Joseph Raphael (“Raphael”) was an inmate housed in the East Unit of FCI Milan’s detention center.

6. Craig Evans (“Evans”) was an inmate housed in the East Unit of FCI Milan’s detention center.

**COUNT ONE**  
**(18 U.S.C. §§ 1111(a), 2 –**  
**First Degree Premeditated Murder, Aiding and Abetting)**

D-1 Alex Albert Castro,  
also known as “Sniper”  
D-2 Jason Dale Kechego,  
also known as “J”

7. The allegations in paragraphs 1 through 4 of the General Allegations are incorporated into this count by reference.

8. On or about January 2, 2019, in the Eastern District of Michigan, at FCI Milan, defendants ALEX ALBERT CASTRO, also known as “Sniper,” and JASON DALE KECHEGO, also known as “J,” and Adam Taylor Wright, also

known as “Creeper,” did willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully kill Christian Maire, by stabbing, beating, kicking, and stomping him, and then throwing him down the stairs, all in violation of Title 18, United States Code, Section 1111(a), and did aid and abet one another in the commission of said unlawful murder, in violation of Title 18, United States Code, Section 2.

**COUNT TWO**  
**(18 U.S.C. § 1117 –**  
**Conspiracy to Commit First Degree Premeditated Murder)**

D-1 Alex Albert Castro,  
also known as “Sniper”

D-2 Jason Dale Kechego,  
also known as “J”

9. The allegations in paragraphs 1 through 4 of the General Allegations are incorporated into this count by reference.

10. On or about January 2, 2019, in the Eastern District of Michigan, defendants ALEX ALBERT CASTRO, also known as “Sniper,” and JASON DALE KECHEGO, also known as “J,” and Adam Taylor Wright, also known as “Creeper,” did knowingly and intentionally combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1111(a).

**Overt Acts**

11. In furtherance of the conspiracy, and to effect its object, one or more of the conspirators committed the following acts, among others, on January 2, 2019:

12. Prior to 8:32 p.m., defendants CASTRO and KECHEGO, and Wright discussed and agreed to “kill the chomos.”

13. Prior to 8:32 p.m., defendant CASTRO obtained a homemade knife, commonly called a “shank,” with the intent to use said shank to kill Christian Maire and Michal Figura;

14. Defendant CASTRO walked upstairs to the cell of Christian Maire and Michal Figura;

15. Defendant KECHEGO followed CASTRO and walked upstairs to the cell of Christian Maire and Michal Figura;

16. Wright followed CASTRO and KECHEGO and walked upstairs to the cell of Christian Maire and Michal Figura;

17. Defendant CASTRO entered the cell of Christian Maire and Michal Figura with a shank in his hand and said, “So you guys are the chomos!”

18. Defendant CASTRO attempted to stab and did stab Michal Figura with a shank multiple times;

19. Defendant CASTRO kicked, punched, and stomped Michal Figura multiple times;

20. Defendant KECHEGO kicked, punched, and stomped Michal Figura multiple times;

21. Wright kicked, punched, and stomped Michal Figura multiple times;

22. Defendant KECHEGO grabbed Christian Maire as he attempted to flee the assault and tried to drag Maire back into his cell;

23. Wright kicked Christian Maire as Maire tried to get away from defendants CASTRO and KECHEGO;

24. Defendant CASTRO kicked, punched and stomped Christian Maire multiple times;

25. Defendant KECHEGO kicked, punched and stomped Christian Maire multiple times;

26. Wright kicked, punched and stomped Christian Maire multiple times;

27. Defendant CASTRO stabbed Christian Maire multiple times with a shank while yelling, "Die, motherfucker, die!"

28. Defendant KECHEGO and Wright dragged Christian Maire away from his cell so that they could continue to assault him;

29. Wright kicked Christian Maire's head multiple times;

30. Defendant KECHEGO stomped Christian Maire's head;

31. Wright confronted and chased Correctional Officer Ryan Greenleaf to prevent him from stopping the defendants' assaults upon Christian Maire and Michal Figura;

32. Wright punched Nurse Clinton White once, striking him in the face and neck, to prevent Nurse White from stopping the defendants' assaults upon Christian Maire and Michal Figura;

33. Defendants CASTRO and KECHEGO, and Wright worked together to drag Christian Maire across the floor and then threw his body down a flight of stairs.

All in violation of Title 18, United States Code, Section 1117.

**COUNT THREE**  
**(18 U.S.C. §§ 113(a)(1), 2 –**  
**Assault with Intent to Commit Murder; Aiding and Abetting)**

D-1 Alex Albert Castro,  
also known as "Sniper"  
D-2 Jason Dale Kechego,  
also known as "J"

34. The allegations in paragraphs 1 through 4 of the General Allegations are incorporated into this count by reference.

35. On or about January 2, 2019, in the Eastern District of Michigan, at FCI Milan, defendants ALEX ALBERT CASTRO, also known as "Sniper," and JASON DALE KECHEGO, also known as "J," and Adam Taylor Wright, also known as "Creeper," did assault Michal Figura, with intent to commit murder by

beating, kicking and stabbing him, in violation of Title 18, United States Code, Section 113(a)(1), and did aid and abet one another in the commission of said unlawful assault, in violation of Title 18, United States Code, Section 2.

**COUNT FOUR**  
**(18 U.S.C. §§ 113(a)(6), 2 –**  
**Assault Resulting in Serious Bodily Injury; Aiding and Abetting)**

D-1 Alex Albert Castro,  
also known as “Sniper”  
D-2 Jason Dale Kechego,  
also known as “J”

36. The allegations in paragraphs 1 through 3 and 5 of the General Allegations are incorporated into this count by reference.

37. On or about January 2, 2019, in the Eastern District of Michigan, at FCI Milan, defendants ALEX ALBERT CASTRO, also known as “Sniper,” and JASON DALE KECHEGO, also known as “J,” and Adam Taylor Wright, also known as “Creeper,” did assault Joseph Raphael, resulting in serious bodily injury, in violation of Title 18, United States Code, Section 113(a)(6), and did aid and abet one another in the commission of said unlawful assault, in violation of Title 18 United States Code, Section 2.

**COUNT FIVE**  
**(18 U.S.C. §§ 113(a)(6) –**  
**Assault Resulting in Serious Bodily Injury)**

D-1 Alex Albert Castro,  
also known as “Sniper”

38. The allegations in paragraphs 1 through 3 and 6 of the General Allegations are incorporated into this count by reference.

39. On or about January 2, 2019, in the Eastern District of Michigan, at FCI Milan, defendant ALEX ALBERT CASTRO, also known as “Sniper,” did assault Craig Evans, resulting in serious bodily injury, in violation of Title 18, United States Code, Section 113(a)(6).



THIS IS A TRUE BILL

*s/ Grand Jury Foreperson*

GRAND JURY FOREPERSON

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Dated: March 24, 2021